

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
Derrick H. Garner, :
Debtor : Bankruptcy No. 17-11514-JKF

**DEBTOR'S RESPONSE TO TRUSTEE'S
MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307**

John S. Di Giorgio, Esquire, attorney for Debtor, Derrick H. Garner, makes the following Response to Trustee's Motion to Dismiss Pursuant to 11 U.S.C. Section 1307 for failure to make payments:

1. Debtor has fallen behind in his payments because of health issues.
2. Debtor will make the necessary payments on or before the hearing date, January 8, 2020.

WHEREFORE, Debtor, Derrick H. Garner, respectfully requests Trustee's Motion to Dismiss be dismissed.

DATED: December 16, 2019


JOHN S. DI GIORGIO, ESQUIRE
1706 Race Street, Suite 404
Philadelphia, PA 19103
Attorney I.D. No.: 21348
Telephone: 215-568-2266
Facsimile: 215-405-2920

Attorney for Debtor,
Derrick H. Garner

cc: Scott F. Waterman, Esquire, Standing Chapter 13 Trustee
Polly A. Langdon, Esquire